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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Billed Party Preference for
0+ InterLATA Calls

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) CC Docket No. 92-77
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NYNEX REPLY COMMENTS

The NYNEX Telephone Companies ("NYNEX") hereby submit these Reply Comments in the above-captioned matter.

I. INTRODUCTION

In its Comments, NYNEX showed that the Commission should not require the industry to implement billed party preference ("BPP") because the costs of BPP outweigh its benefits. Instead, NYNEX recommended that the Commission cap the rates charged by operator service providers ("OSPs"). This would save consumers hundreds of millions of dollars per year without forcing the industry to spend \$2 billion dollars to implement a service for which there appears to be little consumer demand.

The overwhelming majority of commenters agree that BPP should not be implemented. Of the nearly 200 parties filing comments, only 16 expressed support for BPP and most of these

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had conditions attached, principally related to cost recovery.¹ There was, however, widespread support across nearly all industry segments to establish some sort of rate cap to address the issue of overcharging by some OSPs.²

Because the costs of implementing BPP will significantly exceed the anticipated benefits, which can be achieved more efficiently through less expensive means, the Commission should not order the industry to implement BPP.

II. THE COSTS OF BPP OUTWEIGH ITS BENEFITS.

A. The Commission Understated The Costs Of BPP.

In the FNPRM, the Commission found that BPP would likely cost \$420 million per year. In its Comments, NYNEX calculated that it would cost the industry at least \$572 million per year to implement BPP. The data contained in the comments filed by other parties shows that NYNEX's cost study was conservative. The costs of BPP now appear to be at least \$739 million per year.³

¹ For example, Pacific Bell supports BPP provided it is guaranteed full cost recovery from those making operator calls or from the general body of ratepayers.

² See, e.g., AT&T Comments, p. 9; Bell Atlantic Comments, p. 3; APCC Comments, p. 30. Many parties also supported increased use of consumer education programs. See, e.g., NTCA Comments, p. 7.

³ The costs of BPP were developed by using the data contained in the Comments, including the costs of deploying OSS7 signalling to the end office, the costs of 14 digit screening, and the costs of marketing 0+ services as part of the "equal access" conversion to a BPP environment. Non-recurring costs were adjusted for inflation. See Attachment 1 hereto.

Several commenters suggest that OSS7 signalling costs should not be attributable to BPP. GTE and Sprint claim that OSS7 signalling to the end office is not needed. GTE claims that it can use Originating Line Number Screening (OLNS) "to provide the preferred interexchange carrier of the originating line for BPP default call processing purposes."⁴ The OLNS solution, however, only works where the billed party's preferred carrier cannot be determined. For example, under BPP, when an end user makes an international collect call, the call is not carried by the carrier chosen by the party paying for the call (i.e., the end user in the foreign country) but rather by the presubscribed carrier on the line from which the call originated. In this limited situation, OLNS could be used to identify the presubscribed carrier on the originating line. However, this is not likely to occur very often and would not be of use in determining the carrier on most domestic operator service calls.

As NYNEX demonstrated in its Comments,⁵ the Commission must attribute the entire costs of OSS7 software to BPP. Although BPP could be provided without deploying OSS7 software in the end office, it would increase call set-up time by a minimum of four seconds on operator service calls. OSS7 is also more efficient in trunking performance and less susceptible to fraud.

⁴ See GTE Comments, p. 9.

⁵ See NYNEX Comments, pp. 8-9.

B. The Commission Overstated The Benefits Of BPP.

In its Comments, NYNEX demonstrated that the Commission had overstated the benefits of BPP by \$385 million. NYNEX showed that the savings to consumers resulting from BPP would be no more than \$235 million per year. Using the data contained in the comments filed by other parties, NYNEX has revised its original estimate and we now calculate that the benefits of BPP will be no more than \$207.5 million.⁶

The Commission's assumption that savings on commission payments will be passed along to consumers is contradicted by the record. AT&T, for example, stated that it would use these savings to increase its marketing of its 1-800 operator services.⁷ In addition, many call aggregators and premises owners indicated that they would seek to recover lost commissions through higher prices of consumer goods and services.⁸

The comments also confirm that the Commission was incorrect in assuming that by 1997, when BPP is proposed to be implemented, only 50% of operator service calls will be made on a dial-around basis. NYNEX's data as well as that of other

⁶ NYNEX revised its benefit study to reflect a higher commission rate (18.8% rather than 12%) and to reduce the flow-through of commission savings by 50% based on the numerous statements by call aggregators that they would increase the prices of other consumer goods and services to recapture lost commission payments. See Attachment 2.

⁷ See AT&T Comments, pp. 16-17.

⁸ See, e.g., Comments filed by the Minnesota Department of Corrections, City of Oakland, the Cleveland Clinic, and Jeffco Airport.

parties indicates the dial-around rate already exceeds 50% and is increasing rapidly.⁹

III. OTHER ISSUES.

A. Ease Of Use vs. Cost Of Service.

Sprint (p. 10) and Southwestern Bell (p. 5) argue that most consumers do not find access codes easy to use. However, they base this assertion on studies conducted in 1992 before the use of 1-800 operator services began to skyrocket. Focus group research conducted by Ameritech in May 1994 showed that while consumers were attracted to the convenience of 0+ dialing, the dialing method used is significantly influenced by price.¹⁰ It appears that the public is more aware of their options in making operator service calls and purposefully choosing to use dial around measures to make their operator service calls based on simple economics.

B. Jurisdictional Issue.

The Commission also incorrectly assumed that state regulatory commissions would adopt BPP for intrastate interLATA calls. The filings by NARUC and state regulatory commissions from Colorado, Virginia, Idaho and New York provide uncontroverted evidence that a number of state commissions will not adopt BPP for intrastate interLATA calls.

⁹ See Bell Atlantic, p. 8 (55%); SNET, p. 4 (52%). AT&T (p. 8) states that consumer research studies show that awareness of access codes such as 1-800-CALL ATT is now well over 50%.

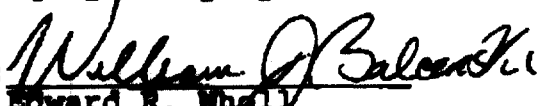
¹⁰ See Ameritech Comments, p. 7.

IV. CONCLUSION.

Based on the data contained in the Comments, it now appears that the costs of BPP (\$739 million) outweigh its benefits (\$207.5 million) by \$531.5 million. Under these circumstances, it is clear that the industry should not be required to implement BPP. The problems that BPP was designed to prevent have already been addressed effectively by activity in the marketplace (e.g., the increasing popularity of 1-800 operator services) and the regulatory arena (e.g., the unblocking requirements of TOCSIA and the Commission's Rules).¹¹ The easiest way of solving the problem of consumers being overcharged is to cap the rates charged by OSPs. The Commission should focus its attention on this rather than require the industry to expend over \$2 billion to implement a service that will cost consumers hundreds of millions of dollars per year.

Respectfully submitted,

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Dated: September 14, 1994
7218/19M

¹¹ NASUCA claims that BPP will help reduce slamming and the associated problem of mislabeled payphones. However, NYNEX and other BOCs have implemented new procedures to verify payphone presubscription change orders. This has addressed the problem effectively without requiring NYNEX to spend over a \$100 million dollars to accomplish the same result through BPP.

ATTACHMENT 1
INDUSTRY COSTS FOR IMPLEMENTATION BPP
(\$ in Millions)

LECS	NON - RECURRING COSTS				TOTAL	RECURRING COSTS			TOTAL
	BASE	0887 TO END OFFICE	14 DIGIT SCREENING		NON-RECURRING CHARGES	BASE	PROCESS. OF INTERLATA 9+ CALLS FOR INDEPENDENTS		RECURRING CHARGES
NYNEX	120.40			3.00		23.10	Est'd	3.30	
US West	148.00		Est'd	3.00		27.00	Est'd	3.30	
Pacific Tel	144.40		Est'd	3.00		28.10	Est'd	3.30	
SMB	118.00			18.00		15.30	Est'd	3.30	
Ameritech	103.00		Est'd	3.00		38.20	Est'd	3.30	
BellSouth	100.00		Est'd	3.00		20.00		3.30	
Bell Atlantic	135.00			3.00		9.00	Est'd	3.30	
GTE	62.00	97.50		5.10		52.50	Est'd	3.30	
Sprint/United	54.70	217.70	Est'd			3.00	Est'd		
Cincinnati	8.00		Est'd	3.00		7.00	Est'd	3.00	
SNET	33.00		Est'd			12.80	Est'd		
USTA	318.10					10.00			
	1,350.00	315.20		48.00	1,712.10	252.10		29.40	281.50
Adj for Inflation CPI = 3.1, 3.5, 3.8					1,882.70				
OBPs									
All OBPs from FNP/PM	120.00								
Initial Equal Access Process	250.00								
	370.00				370.00				
ADJ. for Inflation CPI = 3.1, 3.5, 3.8	408.00				408.00				
INDUSTRY COST					2,301.70				281.50

BPP COST SUMMARY

The total costs of BPP were developed by using the data contained in the Comments. The total costs of BPP are now estimated at \$739 million per year.

Non-Recurring Costs

The non-recurring costs are \$2.3 billion. This includes the costs of deploying OSS7 signalling to the end office and the costs of 14 digit screening. NYNEX agrees with AT&T that the \$250 million cost of marketing 0+ services as part of the "equal access" conversion to a BPP environment must also be included in the Commission's cost/benefit analysis (see AT&T Comments, p. 17.). All costs have been adjusted for inflation. The FNPRM's amortization factor of .29 was used to develop an annual cost figure ($\$2.3 \text{ billion} \times .29 = \668 million).

Recurring Costs

The recurring costs are \$282 million. This includes the estimated costs per large LEC (\$3.3 million) of processing 0+ interLATA calls for independent LECs that obtain operator services from the large LECs within their regions. This cost could increase to \$6.6 million per year if other independents within the large LECs' regions who are not currently served by their operator services would request BPP service. All large LECs will be faced with the same problem of having to serve the independents, unless the independents provide the service for themselves at a much greater cost (see BellSouth Comments, p. 15). Therefore, the added cost to the large LECs for processing calls to independents will be an estimated \$29.4 million per year (assuming that all large LECs will incur the same costs as BellSouth, and that United/Cincinnati/SNET will add another \$3.0 million total to this cost).

Recurring costs have not been adjusted for inflation. NYNEX reduced the LEC recurring costs of \$282 million by 75% consistent with the Commission's assumption that these increased LEC costs will be offset by cost reductions to OSPs. However, as noted by US Long Distance in its Comments (p. 5), this assumption is unfounded. Even without considering this assertion, the annual recurring costs are conservatively estimated at \$71 million using the Commission's assumption.

Total BPP Costs

The total costs to the industry are:

Total annual amortized non-recurring costs	\$ 668 million
Total annual recurring costs	<u>\$ 71 million</u>
Total annual industry cost to implement BPP	\$ 739 million

The total annual industry costs do not include:

- SNET's additional costs which are noted as "exceeding \$33 million by a substantial margin" (SNET comments p. 6).
NYNEX Attachment 1 uses \$33 million
- costs to provide Alaska BPP service (see Anchorage Telephone Utility p. 2)
- LEC overhead costs
- costs for unanticipated technical problems as experienced in all new services

REDUCTION OF COMMISSION PAYMENTS

Based on information contained in the Comments, NYNEX has revised the estimated benefits of BPP caused by reduced commission payments. The call aggregators have overwhelmingly indicated that they will recoup the commissions that they currently receive in some other way. NYNEX conservatively estimates that 50% of the commissions will not go back to the consumers, but will be paid by the consumers in the form of additional concession prices, higher airline tickets, or reduced services.

NYNEX is also revising the commission rate paid to the aggregators based on the comments of Sprint and AT&T. Sprint claims that the commission rate is 27% while AT&T uses a 14% rate in their analysis. Weighting these commissions based on market share, NYNEX has determined that the commission rate should be 18.8%.

Thus, the new analysis for reduction of commission payments is:

\$6.1B revenue	X 1.043 for six years	=	\$7.9B
\$7.9B	adj. for traffic migration	=	\$7.7B
\$7.7B	X 63.7% interstate calls	=	\$4.9B
\$4.9B	X non-dial around calls	=	\$0.98B
\$0.98B	X 18.8% commission rate	=	\$184.2M
\$184.2M	X 50% non-consumer savings	=	\$92.1M
\$92.1M	- \$22M increased COCOT compensation	=	\$70.1M
\$70.1M	- \$5.4M per FNPRM*	=	\$64.7M

TOTAL SAVINGS FROM BENEFITS OF BPP

This \$64.7M savings is added to the \$142.8M savings from OSP rate reductions to arrive at a total BPP benefit to the consumer of \$207.5M annually.

REVISED COSTS/BENEFIT ANALYSIS

Based on the Comments, the revised annual costs of BPP as shown in Attachment 1 are \$739M. The total annual savings from BPP amount to \$207.5M. Thus, implementation of BPP will result in an annual cost to the consumer of \$531.5M.

* \$142.8M third tier OSP revenues x 20% non-dial around x 18.8% commission rate = \$5.4M less commissions due to reduced third tier OSP revenues.

CERTIFICATE OF SERVICE

I certify that copies of the foregoing NYNEX REPLY COMMENTS, CC Docket No. 92-77, were served on each of the parties listed on the attached Service List, this 14th day of September, 1994, by first class United States mail, postage prepaid.


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